

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LUXOTTICA GROUP S.p.A. and OAKLEY, INC.,)	
)	Case No. 16-cv-00487
)	
Plaintiffs,)	Judge Manish S. Shah
)	
v.)	Magistrate Judge Sheila Finnegan
)	
HAO LI, et al.,)	
)	
Defendants.)	
)	

**PLAINTIFFS’ MOTION FOR SUMMARY JUDGMENT
AND A STATUTORY DAMAGES AWARD AS TO THE
DEFENDANT IDENTIFIED BY AND OPERATING AT LEAST THE INTERNET
STORES DEALSGOING, SFCDIRECT AND UPTOGETHERTEK**

Plaintiffs Luxottica Group S.p.A. and Oakley, Inc.¹ (collectively, “Luxottica” or “Plaintiffs”), by their counsel, move this Court to enter summary judgment in favor of Luxottica and against the Defendant identified by and operating at least the Internet Stores dealsgoing, sfcdirect and uptogethertek (“Defendant”), award Luxottica at least ninety thousand dollars (\$90,000) in statutory damages for willful counterfeiting of the WAYFARER Trademark pursuant to 15 U.S.C. § 1117(c), enter a permanent injunction prohibiting Defendant from selling and offering for sale Counterfeit Products and award Luxottica reasonable attorney’s fees and costs pursuant to 15 U.S.C. § 1117(a) and (b). In support of this Motion, Luxottica submits the accompanying Memorandum.

¹ Plaintiff Oakley, Inc. (“Oakley”), is an indirect, wholly-owned subsidiary of Luxottica.

Dated this 24th day of March 2016.

Respectfully submitted,

/s/ Justin R. Gaudio

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Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of March 2016, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system. The CM/ECF system will send a “Notice of E-Filing” to the attorneys of record in the case.

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